

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

B.P., et al.,

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.,

Defendants.

_____/

NOTICE OF LODGING DOCUMENTS UNDER SEAL
TO THE COURT AND ITS ATTORNEYS OF RECORD:

Plaintiffs hereby give notice that they are provisionally lodging under seal Exhibits 3 and 5 to the Declaration of Vanessa Baehr-Jones in support of Plaintiffs' Opposition to Justin Jenkins' Motion to Quash and for Protective Order (ECF 318) ("Plaintiffs' Opposition").

Sealed filing is appropriate with respect to Exhibit 3 as it contains Justin Jenkins' responses to Discovery which contains sensitive financial information and has been designated Confidential by his counsel. Sealed filing is appropriate with respect to Exhibit 5 because it contains a record from Female 3's case file which has been designated Confidential by Defendant Johnson City. For the reasons set forth in ECF 284 and 299, Plaintiffs do not agree that there is a legal basis to continue to seal all documents relating to Female 3's case, but nevertheless file this exhibit under seal provisionally based on its Confidential designation.

Plaintiffs have met and conferred with counsel for Jenkins and for the City regarding Exhibits 3 and 5.

Dated: September 24, 2024

Respectfully submitted,

Advocates for Survivors of Abuse PC

/s/ Vanessa Baehr-Jones

Vanessa Baehr-Jones CABN # 281715

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on September 24, 2024 to counsel of record:

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/s/ Vanessa Baehr-Jones
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